

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

JOSHUA BROOKS

Plaintiff,

v.

SERTA SIMMONS BEDDING, LLC

Defendant.

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CASE NO. 4:22-CV-01023-JAR

CASE NO. 4:24-CV-00097-MTS

DEFENDANT’S MOTION TO COMPEL DISCOVERY

COMES NOW, Defendant Serta Simmons Bedding, LLC (“SSB”) and, pursuant to Local Rule 3.04 and Rule 37 of the Federal Rules of Civil Procedure, files this Motion to Compel Discovery (“Motion”). As set forth more fully in the accompanying Memorandum in Support of its Motion, Plaintiff Joshua Brooks has engaged in stonewalling; asserting unfounded, boilerplate objections; provided incomplete, evasive, or false answers or responses; and/or has failed to otherwise comply with his obligations under the Federal Rules of Civil Procedure with respect to his initial disclosures under Rule 26, SSB’s First Interrogatories to Plaintiff, and SSB’s First Request for Production of Documents to Plaintiff, notwithstanding SSB’s good faith efforts to resolve discovery matters without this Court’s action.

Therefore, SSB respectfully moves this Court for an Order (1) summarily overruling Plaintiff’s objections that are not stated in detail, (2) compelling complete and accurate disclosures under Rule 26(a), (3) compelling complete and accurate responses to SSB’s Interrogatories Nos. 7, 10, 12, 15, 16, and 17 and RFP Nos. 3, 9, 10, 15, 16, 28, 30, and 33-62 and (4) awarding SSB its reasonable expenses in making this Motion, including its attorneys’ fees.

Respectfully submitted this 1st day of April, 2025.

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CERTIFICATE OF SERVICE

I certify that on April 1, 2025, a copy of the foregoing was filed and served via the Court's electronic filing system upon the following:

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